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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11
12 Plaintiff,
13 v.
14 EDUARDO LOPEZ,
15 Defendant.

Case No. 2:20-cr-00119-RFB-DJA

**STIPULATION TO CONTINUE
REVOCATION HEARING**
(Fourth Request)

16
17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
18 United States Attorney, and Jacob Haile Operskalski, Assistant United States Attorney, counsel
19 for the United States of America, and Rene L. Valladares, Federal Public Defender, and
20 LaRonda Martin, Assistant Federal Public Defender, counsel for Eduardo Lopez, that the
21 Revocation Hearing currently scheduled on May 7, 2024, be vacated and continued to a date
22 and time convenient to the Court, but no sooner than sixty (60) days.

23 This Stipulation is entered into for the following reasons:

24 1. Eduardo Lopez was arrested for the offense of Possession of a Gun by Prohibited
25 Person, in violation of N.R.S. 200.360.1.¹
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¹ ECF. 78.

2. Undersigned counsel consulted with the assigned state public defender. Counsel advised that the state case is scheduled for a preliminary hearing on June 12, 2024. The parties are in negotiation. An offer was recently extended.

3. Mr. Lopez and his state defense attorney need additional time to evaluate the status of their case and the offer extended.

4. Moreover, undersigned counsel anticipates being in trial in *United States v. Dallmann*, 2:22-CR-00030-RFB-DJA-1, throughout the entire month of June 2024 and thus, unable to meet with Mr. Lopez during this time frame.

5. Should the state case be resolved at the next court setting, undersigned counsel will need time to meet and confer with the United States Attorney's office and the Office of Federal Probation to determine if an agreement can be reached between the parties regarding the instant case.

6. Finally, Mr. Lopez will need time to assess whether the terms proposed for the instant case are acceptable or whether to proceed with a full hearing.

7. The defendant is in custody and agrees with the need for the continuance.

8. The parties agree to the continuance.

This is the fourth request for a continuance of the revocation hearing.

DATED this 1st day of May, 2024.

RENE L. VALLADARES
Federal Public Defender

JASON M. FRIERSON
United States Attorney

By /s/ LaRonda Martin
LARONDA MARTIN
Assistant Federal Public Defender

By /s/ Jacob Haile Operskalski
JACOB HAILE OPERSKALSKI
Assistant United States Attorney

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

EDUARDO LOPEZ,

Defendant.

Case No. 2:20-cr-00119-RFB-DJA

ORDER

IT IS THEREFORE ORDERED that the revocation hearing currently scheduled for May 7, 2024 at 8:30 a.m., be vacated and continued to August 8, 2024 at 12:30 p.m.

DATED this 2nd day of May, 2024.



UNITED STATES DISTRICT JUDGE